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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

HEIDI FIORENTINO,

 Plaintiff,

 v .

PHILADELPHIA INDEMNITY
INSURANCE COMPANY, and DOES 1
through 25, inclusive,

 Defendants.

Case No. 1:24-cv-01023-KES-SAB

**STIPULATION AND ORDER ON JOINT
REQUEST TO EXTEND TIME FOR
FILING OF MOTION TO DISMISS**

STIPULATION

It is hereby stipulated between plaintiff, HEIDI FIORENTINO and defendant, PHILADELPHIA INDEMNITY INSURANCE COMPANY, by and through their respective counsel, that the filing deadline for defendant PHILADELPHIA INDEMNITY INSURANCE COMPANY'S motion to dismiss, currently set for Tuesday, January 21, 2025, be reset to Friday, January 24, 2025, so that parties may have time to conduct settlement negotiations, as follows:

1. On December 30, 2024, plaintiff filed a first amended complaint, Doc. 20;
2. Per the Court's order granting motion to dismiss with partial leave to amend, defendant has 21 days from the date of the filing of the first amended complaint to file a motion to dismiss, and that deadline will fall on Tuesday, January 21, 2025, in light of the federal holiday;
3. The parties are engaged in settlement discussions; and
4. Based on the foregoing, counsel jointly request that the deadline for the filing of defendant's motion to dismiss be reset to Friday, January 24, 2025.

IT IS SO STIPULATED.

Dated: January 17, 2025

Respectfully submitted,

PABOOJIAN, INC.

By: /s/ Adam B. Stirrup (authorized to sign)
Adam B. Stirrup
Attorneys for Plaintiff HEIDI FIORENTINO

Dated: January 17, 2025

CLYDE & CO US LLP

By: /s/ Alec H. Boyd
Amy M. Samberg
Alec H. Boyd
Attorneys for Defendant PHILADELPHIA
INDEMNITY INSURANCE COMPANY

ORDER

Pursuant to the stipulation of the parties, IT IS HEREBY ORDERED that the deadline for defendant to file its motion to dismiss is extended to Friday, January 24, 2025.

IT IS SO ORDERED.

Dated: January 17, 2025

A handwritten signature in blue ink, appearing to read "Keith Smith", is written over a horizontal line.

UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 355 S. Grand Avenue, Suite 1400, Los Angeles, CA 90071.

On **January 17, 2025**, I served true copies of the following document(s) described as **STIPULATION ON JOINT REQUEST TO EXTEND TIME FOR FILING OF MOTION TO DISMISS; AND ORDER THEREON** on the interested parties in this action as follows:

Warren R. Paboojian PABOOJIAN, INC. 720 West Alluvial Avenue Fresno, CA 93711 Phone: (559) 431-5366 wrp@paboojianlaw.com	Attorneys for Plaintiff HEIDI FIORENTINO
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- ☒ **EMAIL** - by transmitting via email the document(s) listed above to the email address(es) set forth in the attached Service List below on this day before 5:00 p.m.
- ☐ **MAIL** - by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail in Los Angeles, California addressed as set forth below.
- ☐ **PERSONAL SERVICE** - by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- ☐ **OVERNIGHT COURIER** - by placing the document(s) listed above in a sealed envelope with shipping prepaid, and depositing in a collection box for next day delivery to the person(s) at the address(es) set forth below via Federal Express.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **January 17, 2025**, at Los Angeles California.

/s/ Gale L. Matteson
Gale L. Matteson